

AO 91 (Rev 8/01) Criminal Complaint

United States District Court
Southern District Of Texas
FILED

United States District Court

JUL 14 2020

SOUTHERN

DISTRICT OF

TEXAS David J. Bradley, Clerk

McALLEN DIVISION

**UNITED STATES OF AMERICA
V.**

CRIMINAL COMPLAINT

Case Number: M-20- 1367 -M

Edgar LOPEZ, 1994 (USA)

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about 07/12/2020 in Starr County, in the Southern District of Texas the defendant(s)

(Track Statutory Language of Offense)

21 USC 841 & 846 - Conspiracy to Possess with the Intent to Distribute and Possession with Intent to Distribute Methamphetamine, approximately 216.0 kilograms, a schedule II controlled substance.

in violation of Title 21 United States Code, Section(s) USC 841 & 846

I further state that I am a(n) Texas DPS CID Special Agent and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part of this complaint:

Yes ☒ No

Approved by: AUSA Patricia Cook Profit

Submitted by reliable electronic means, sworn to and attested to telephonically per Fed. R. Cr. P. 4.1, and probable cause found on:

July 14, 2020

@ 5:00 PM

J. Scott Hacker
Name and Title of Judicial Officer

, U.S. Magistrate Judge

/s/ Jose Rodriguez

Signature of Complainant

Jose Rodriguez Texas DPS CID Special Agent

[Signature]
Signature of Judicial Officer

ATTACHMENT 1

1. On July 12, 2020, U.S. Border Patrol Agents (BPA) observed suspected scouts in the area of Midway Road, Rio Grande City, Texas. Shortly thereafter, a BPA observed multiple subjects carrying bundles of suspected narcotics from the Rio Grande River to the Midway Cemetery located off Midway Road.
2. At approximately 4:03 p.m., a BPA observed a gold pickup truck, later identified as being a 2000 Chevrolet Silverado, Texas/License Plate: LHM9093, arrived at the Midway Cemetery. Subsequent to seeing the Silverado arrive at the Midway Cemetery, the BPA observed that the subjects loaded bundles of suspected narcotics into the cab and bed of the Silverado. The BPA then observed the Silverado depart the area and relayed the information and direction of travel to Texas DPS Rangers and Troopers.
3. Shortly thereafter, a Texas Ranger located the Silverado traveling eastbound on U.S. Expressway 83 in Rio Grande City, Texas and proceeded to follow the Silverado as it turned north onto Hernandez Road. Upon following the Silverado, the Texas Ranger observed the Silverado accelerate at a high rate of speed and lose control at the intersection of El Campo Road and Papalote Road. The Texas Ranger then observed the Silverado roll over onto the driver's side door. The Texas Ranger then observed the driver of the Silverado crawl out of the passenger side door and abscond into the brush. Texas Rangers and Troopers were not able to locate the driver of the Silverado.
4. Texas Rangers and Troopers discovered eight (8) large sacks, containing two hundred (200) cellophane wrapped bundles containing a crystallized substance suspected to be methamphetamine, inside of the abandoned Silverado. The suspected methamphetamine was later processed and weighed approximately 216.00 kilograms. Two (2) field tests were conducted on samples removed from two (2) of the bundles, which tested positive for the characteristics and properties of methamphetamine.
5. Texas DPS CID Agents, Texas Rangers, and BPAs conducted a follow up investigation on the Silverado and discovered that the Silverado was sent to secondary inspection at the USBP checkpoint in Falfurrias, Texas on July 01, 2020. Further investigation led Agents to a subject associated with the Silverado.
6. On July 13, 2020, Agents conducted a field interview on the subject associated with the Silverado to which the subject provided an address located in Rio Grande City, Texas where the subject had previously observed the Silverado. Agents subsequently conducted research on the address and discovered that Edgar LOPEZ resides at the address.
7. DPS CID Agents presented a photograph of Edgar LOPEZ to the Texas Ranger who observed the driver crawl out of and then abscond from the Silverado on July 12, 2020. The Texas Ranger positively identified Edgar LOPEZ as the driver of the Silverado that fled from law enforcement on July 12, 2020 following the methamphetamine smuggling attempt.